

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

GRAY WATSON,

Plaintiff,

v.

JOHN DOE and
256.com, an Internet domain name,

Defendants.

No. 1:15-cv-831-AJT-MSN

PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT

Plaintiff GRAY WATSON, by counsel, hereby moves, pursuant to Fed. R. Civ. P. 55(b) and the Local Rules of this Court, for the entry of a default judgment against defendants John Doe and Internet domain name 256.com in accordance with the accompanying memorandum of points and authorities.

As set forth in more detail in the accompanying memorandum of points and authorities, the Defendant domain name is a .COM domain name maintained in this judicial district by the top-level domain name registry for .COM domain names, VeriSign, Inc. Plaintiff moves for an Order directing VeriSign, Inc. to transfer the Defendant domain name to Plaintiff's domain name registrar of choice, eNom, Inc., and directing eNom, Inc. to take all necessary steps to have plaintiff GRAY WATSON listed as the registrant for the domain names.

Dated: November 19, 2015

By: /s/ Attison L. Barnes, III /s/

Attison L. Barnes, III (VA Bar No. 30458)

David E. Weslow (admitted *pro hac vice*)

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Counsel for Plaintiff

Gray Watson

CERTIFICATE OF SERVICE

I, Attison L. Barnes, III, hereby certify that on November 19, 2015, I electronically filed the foregoing by using the CM/ECF system. I also sent copies to the postal and email addresses provided in the domain name registration record for the 256.com domain name:

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/s/ Attison L. Barnes, III

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